Scott M. Matheson, Spvernor Temple A. Reynolds, Executive Director Cleon B. Feight, Division Director

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August 12, 1982

Mr. James Godlove Director of Environmental Affairs White River Shale Oil Corporation Suite 500 Prudential Building 115 South Main Street Salt Lake City, Utah 84111

RE:

August 4, 1982 Inspection White River Shale Project

ACT/047/017

Uintah County, Utah

Dear Mr. Godlove:

As you are aware, the Division has made an exceptional effort in attempting to keep White River Shale Oil Corporation (WRSOC) on its construction schedule and in compliance with its stipulations. This intent was made manifest in the July 8, 1982 letter of limited approval.

On August 4, 1982, Division personnel inspected WRSOC's construction site. Unapproved disturbances were observed at both the RV construction camp (referred to as the interim construction camp in the permit application), and the retention pond site. Division representatives became somewhat concerned as to WRSOC's intentions toward compliance with the limited approval. All operational areas require Division approval prior to development.

The topsoil handling was of particular concern. The topsoil isopach maps should be used to assist in topsoil removal during construction and the soils should be handled in accordance with the "topsoil management plan." This is intended to encourage employment of the best procedures to salvage soil on-site and should apply even in cases where the permitting status of the area is questionable.

A misconception among the WRSOC construction personnel on-site was apparent with regard to the topsoil storage area, as a portion of the soil was being slated to cover road embankments. The equipment operator was informed that enough soil to reclaim the site should be stockpiled as a priority. Additional soil could be used for road embankments only after adequate soil was stockpiled to cover areas to be reclaimed.

The operator also indicated that grubbed vegetation would be left in the soil stockpile. He was informed that this was not desirable since organic layers could cause a slippage plane, thus a stability problem upon decomposition of the material. The operator further indicated that a 20 foot depth of topsoil storage would occur. The mine plan permits only a 15 foot depth. Division personnel informed the operator of this discrepancy as well.

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Please address these concerns regarding topsoil handling at the RV camp site, the proposed storage of grubbed vegetation in the soil stockpile, and the additional measures to be implemented toward compliance with the topsoil management plan.

During the tour it became apparent that the content of the mining and reclamation plan and its amendments were not readily translated to the construction crew. It is strongly recommended that WRSOC initiate a better understanding of what has been committed to and approved in the plan to construction supervisors in order to avoid future problems. Your attention and cooperation in this matter is greatly appreciated. If you have any questions, please don't hesitate to call either myself or Tom Portle.

Sincerely,

Lean

JAMÈS W. SMITH, JR. COORDINATOR OF MINED LAND

DEVELOPMENT

JWS/dc

cc: Ralph DeLeonardis, WRSOC